

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND
SOUTHWEST AREAS PENSION FUND
and HOWARD McDougall, trustee,

Plaintiffs,

V.

JDS TRUCKING, INCORPORATED,
an Indiana corporation,

Defendant.

Case No. 07 C 6158

District Judge Harry D. Leinenweber

Magistrate Judge Denlow

AFFIDAVIT OF LAURA B. BACON

State of Illinois)

County of Cook)

SS:

I, Laura B. Bacon, having been fully sworn upon my oath, depose and state as follows:

1. I am an attorney employed by Plaintiff Central States, Southeast and Southwest Areas Pension Fund ("Pension Fund").

2. I was admitted to the bar of the State of Illinois in 2006 and to the bar of the United States District Court for the Northern District of Illinois in 2007.

3. I have personal knowledge with respect to the matters set forth in this Affidavit and am familiar with the above-captioned litigation.

4. I have reviewed the Pension Fund's billing records and have determined that the work performed in connection with this case was performed by myself ("LBB").

5. Copies of the billing records generated in this matter and reflecting the work performed, and the expenses incurred, are attached hereto as Exhibit 1.

6. I believe that a reasonable rate for the aforementioned legal services is \$135 per hour.

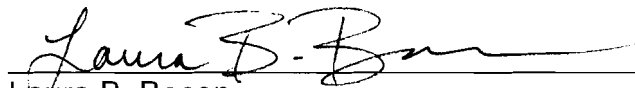
7. On that basis, the legal fees incurred in this matter are \$850.50 for 6.30 total hours.

8. The Pension Fund has also incurred costs in the amount of \$405.00 in connection with this litigation.

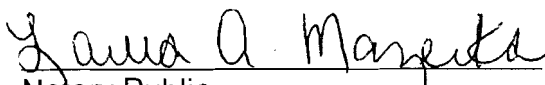
9. Consequently, the total amount of attorney's fees and costs owed is \$1,255.50.

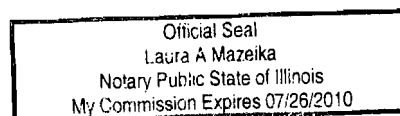
10. I believe that the aforementioned court costs and attorney's fees were necessarily incurred and are reasonable in amount.

FURTHER AFFIANT SAYETH NAUGHT


Laura B. Bacon

Subscribed and sworn to before me,
a Notary Public of the State of Illinois,
this 19th day of December, 2007.


Notary Public



**Central States Funds
9377 West Higgins Road
Rosemont, Illinois 60018**

December 19, 2007

Case Name: **JDS Trucking, Inc**

Control No: **07410028**

Case Type: **WLL**

Allocation: **2**

Description of Services

			<u>Hours</u>	<u>Amount</u>
10/25/2007	LBB	Review file; begin drafting complaint.	0.50	67.50
10/29/2007	LBB	Draft complaint; email to Susan Tebbens.	1.50	202.50
11/5/2007	LBB	Memo to Pete Priede; summons to George O. Hansen.	0.30	40.50
11/27/2007	LBB	Phone conference with employer regarding payment plan.	0.50	67.50
12/10/2007	LBB	Draft letter to employer regarding documents.	0.50	67.50
12/18/2007	LBB	Draft default motion.	2.00	270.00
12/19/2007	LBB	Edit and finalize default motion.	1.00	135.00
Total Fees			6.30	\$850.50

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Expenses

		<u>Amount</u>
10/30/2007	Complaint filed.	350.00
11/13/2007	Serving Colleen Sachman Summons and complaint.	55.00
Total Expenses		<hr/> \$405.00
Total amount of this bill		<hr/> \$1,255.50 <hr/>